

United States District Court

William F. DAVIS III

- V -

Betty Bradley

And

Benjamin Robinson

Civil Action No. 04-209-SLR

Plaintiff, William F. DAVIS III Pursuant to Rules 15(A) and 19(A), Fed. R. Civ. requests leave to file an Amended Complaint adding a party, newly named Defendants.

1. the plaintiff in his original Complaint, Betty Bradley and Benjamin Robinson Defendant.
2. since the filing of the Complaint the plaintiff has determined that the name Betty Bradley and Benjamin Robinson, Defendant are amended to reflect the identity and the actions of Defendant, Betty Bradley and Benjamin Robinson.
3. this Court should grant leave freely to amend a Complaint, Foman v. DAVIS, 371 U.S. 178, 187 (1962.)

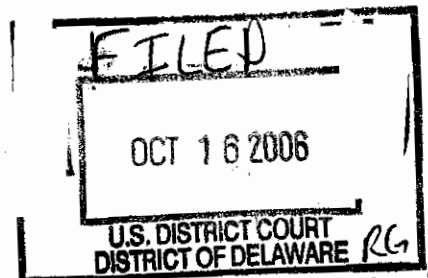
Date: 10-3-06

William F. DAVIS III

S.B. # 162762

Delaware Correctional Center

1181 Paddock, Road Smyrna, Del 19977



SC 011

Statement of Claim

in this statement of Claim, I William F. DAVIS III Am showing how the First Correctional medical Incorporated Including Doctor Benjamin Robinson and Nurse Betty Bradley displayed deliberate indifference, negligence, and reckless regard for my well being and health by failing to act reasonably in response to the danger I was in due to my hernia.

On May twenty two, of the year two thousand two I, William F. DAVIS III Complained of Abdominal pain and was seen by first Correctional medical. On May twenty three of the year two thousand and two, I William F. DAVIS III was seen again and the hernia's were diagnosed as easily reducible and not causing pain. On June six of the year two thousand and two, I William F. DAVIS III was seen yet again for pain and it was determined that the hernia's were not reducible. That is when I, William F. DAVIS III was admitted and X-rays were took. The end results of the X-rays was that my pancreas was inflamed and my bowel was obstructed. While in the infirmary I was placed on a liquid diet, stool softener and pain medicine.

Because of these serious medical problems I, William F. DAVIS III could no longer work, Exercise, play basketball, Eat or sleep due to the agonizing pain from the hernia. Doctor Benjamin Robinson and Nurse Betty Bradley work for First Correctional medical were deliberately indifferent and negligent because they knew from the diagnosis that my hernia's was not reducible, causing all kinds of agonizing pain, and keeping me from normal activities such as work, exercise, sports and sleep, and Doctor Benjamin Robinson and Nurse Betty Bradley did nothing for 3 1/2 months. I, William F. DAVIS III Am holding First Correctional medical including Doctor Benjamin Robinson and Nurse Betty Bradley personally liable because they completely ignored the diagnosis resulting in losing 4 inches of my intestines,

Finding feces inside of Abdominal and leaving me with a very hideous and unattractive long scar on my abdominal.

First Correctional medical ~~+~~ cooperated, including Doctor Benjamin Robinson and nurse Betty Bradley violated my eighth Amendment right; cruel and unusual punishment that Doctor Benjamin Robinson and Betty Bradley displayed that they ignored the diagnosis for three and a half month, ultimately resulting in injury by losing four inches of my intestines, not being able to eat or sleep and work, finding feces inside of my abdominal and leaving me scared for the rest of my life physically and mentally.

Doctor, Benjamin Robinson and nurse Betty Bradley also displayed medical malpractice by ignoring my diagnosis for three and a half months, me, William F. Davis III. This misdiagnosis resulted in losing four inches of intestines, finding feces inside of me. Also ^{Saint Francis} ~~Porter~~ ~~mamm~~ ~~mon~~ said if ~~an~~ infection had developed in result to finding feces in my abdominal that I would have suffered serious complications, or death.

Complaint should not be Dismissed
one prisoner's Section 1983 Case called
Cruz v. Beto, 405 U.S. 319, 322 (1972).
or
Tonley v. Gibson, 355 U.S. 41, 45-46 (1957).

Respectfully
William F. Davis III

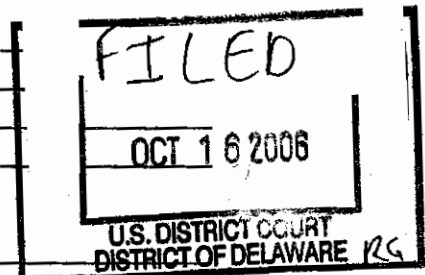
CERTIFICATE OF SERVICE

I, William F. Davis III, hereby swear under penalty of perjury that I have rendered service of a true and correct cop(ies) of the attached:

Pursuant to Rules 15(A) and 19(A) Fed. R. Civ. Ameded Complaint
(Title or Type of Motion or Request)

upon the following person(s) and/or agency(ies):

Daniel L. McKenty
McCallough B. McKenty, P.A.
1225 North King Street, Suite 1100
P.O. Box 397
Wilmington, DE, 19899-0397



BY PLACING SAME IN A SEALED ENVELOPE, postage will be paid by the Delaware Department of Corrections/Pre-paid, and depositing same in the United States Mail at the Multipurpose Criminal Justice Facility, 1301 East 12th Street, Wilmington, Delaware.

On this 10 day of Oct, 2006.

William F. Davis III
(Your signature)



Office of the Clerk
United States District Court
844 N. King Street, Lock box 18
Wilmington, Del
19801-3570